

August 9, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Written *Ex Parte* Submission, IB Docket Nos. 11-109 and 12-340; RM-11681; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, SAT-MOD-20151231-00091.

Dear Ms. Dortch:

Inmarsat Inc. and its affiliates (together, “Inmarsat”) submit this *ex parte* letter to clarify the record in the above-captioned proceedings with respect to an assertion made by Aviation Spectrum Resources, Inc. (“ASRI”), Airlines for America (“A4A”), Helicopter Association International (“HAI”), and the Aerospace Industry Association (“AIA”) in their joint letter dated June 20, 2017.¹

ASRI *et al.*, expressed their concern in their filing about the potential impact to Inmarsat’s systems that might be caused by Ligado’s proposed terrestrial deployment.² In doing so, the parties asserted that Inmarsat had stated “concerns about compatibility with Ligado” in a December 2015 response to a consultation by the UK spectrum regulator, Ofcom.³

Actually, Inmarsat never mentioned “Ligado” or referred to it in the December 2015 Ofcom filing. Indeed, the Ofcom consultation concerned a different proposed use of the L-Band spectrum—professional wireless microphones known as PMSE—and had nothing to do with Ligado at all. There are material differences between the PMSE proposal and Ligado’s proposed

¹ Letter from Edward A. Yorkgitis, Jr, Counsel for Aviation Spectrum Resources, Inc., to Marlene H. Dortch, Secretary, Federal Communications Commission, IB Docket Nos. 11-109 and 12-340; RM-11681; IBFS File Nos. SES-MOD-20151231-00981, SAT-MOD-20151231-00090, SAT-MOD-20151231-00091 (filed June 20, 2017) (“ASRI *et al.* Letter”)

² ASRI *et al.* Letter at 4.

³ *Id.* citing Inmarsat Response, Ofcom Consultation Document: New Spectrum for Audio PMSE (Dec. 18, 2015) *available at* https://www.ofcom.org.uk/_data/assets/pdf_file/0023/58226/inmarsat.pdf.

terrestrial deployment. Most significantly, the PMSE devices were proposed to operate co-frequency with Inmarsat in the L-band, while Ligado's system will operate on separate frequencies, pursuant to the cooperation agreement between the two operators. As such, the December 2015 Ofcom filing by Inmarsat, including the technical analysis and concerns raised therein, is not relevant to the above-captioned proceedings. The reference to that filing made by ASRI *et al.* is erroneous.

Inmarsat reiterates its support for prompt Commission action on Ligado's Modification Applications.

Respectfully submitted,

/s/ Donna Bethea-Murphy

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